

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NO. 2014-346-WS**

IN RE:

Application of Daufuskie Island Utility  
Company, Inc. for Approval of an  
Adjustment for Water and Sewer Rates,  
Terms, and Conditions

)  
)  
)  
)  
)  
)  
)

**PETITION TO INTERVENE**

Haig Point Club and Community Association, Inc. (“HPCCA”), Melrose Property Owner’s Association, Inc. (“MPOA”), and Bloody Point Property Owner’s Association (“BPPOA”) (together “Petitioners”) hereby petition the South Carolina Public Service Commission (“Commission”) pursuant to Rule 103-825 of its Rules of Practice and Procedure (10 S.C. Code Ann. Regs. 103-825), to be allowed to intervene as formal parties of record in the above-captioned proceeding. In support of this Petition, Petitioners would show as follows:

1. On June 9, 2015, Daufuskie Island Utility Company, Inc. (“DIUC” or “Applicant”) filed an Application for approval to increase its rates for water and sewer services. The Application was filed pursuant to S.C. Code Ann. §58-5-210 *et. seq.*, and 10 S.C. Code Ann. Regs. 103-514.4, 103-712.4, and 103-834. According to the Application, DIUC provides general utility services on Daufuskie Island, Beaufort County, South Carolina. Within its service area, DIUC provides water supply and distribution service and sewer collection and treatment services to residential and commercial customers. In addition, the Company provides water service for landscaping and golf course irrigation. The subdivisions or tracts included in the Applicant’s

service area are Haig Point, Cedar Cove Subdivision, Oakridge Subdivision, Beachfield Subdivision, Melrose, and Bloody Point.

Among other things, and according to DIUC, the Application seeks to:

- Eliminate the current water and sewer usage allowances that currently exist for Melrose and Bloody Point, and apply volumetric rates to water and sewer usage by all customers, as it currently applies under the DIUC tariff;
- Apply inclining block rates to all irrigation customers, as currently applicable in the DIUC tariff; and
- Establish uniform rates for all DIUC customers.

Upon information and belief, DIUC's proposed rates will result in an overall revenue increase of 108%, but some of the proposed rates would be between two and three times higher than the equivalent current rates, depending upon customer and usage.

2. HPCCA, MPOA and BPPOA are associations whose members include Daufuskie Island property owners and residents, many of whom are DIUC's residential and commercial water and sewer customers.

3. The Commission's Docketing department issued several Notices of Filing in this matter, the most recent on June 25, 2015, and scheduled a public hearing for Wednesday October 25, 2015. That Notice of Filing set a deadline for intervention in this Docket of July 27, 2015.

4. The Petitioners have a vital interest in this proceeding. Petitioners' members who are DIUC residential and commercial water and sewer customers will be affected by the proposed rate increase because it would:

- a. dramatically increase their water and sewer service rates;

- b. change the rate structure for many customers; and
- c. for the first time, establish unified system-wide water and sewer rates.

5. At this time, HPCCA, MPOA and BPPOA oppose the proposed rate increase, but do not possess sufficient information to form a more detailed position in this proceeding. Participation in this Docket will allow Petitioners to obtain the information necessary to establish that position.

6. Petitioners seek to participate in this proceeding in order to more fully establish and assert their position and in order to assist in addressing the important issues raised. Petitioners should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.

7. Petitioners' authorized representatives in this proceeding are:

John F. Beach  
John J. Pringle, Jr.  
Lyndey Ritz Zwing  
**ADAMS AND REESE LLP**  
1501 Main Street, 5th Floor  
Post Office Box 2285 (29202)  
Columbia, South Carolina 29201  
Telephone: (803) 254-4190  
Facsimile: (803) 779-4749  
Email: [john.beach@arlaw.com](mailto:john.beach@arlaw.com)  
[jack.pringle@arlaw.com](mailto:jack.pringle@arlaw.com)  
[lyndey.zwing@arlaw.com](mailto:lyndey.zwing@arlaw.com)

8. Petitioners request that they be allowed to intervene in the above-captioned matter, that they be permitted to participate fully as parties of record, to present testimony, cross-examine witnesses, and assert whatever position they deem to be appropriate.

**WHEREFORE**, Petitioners pray for the following relief:

- a. That the Commission accept this Petition to Intervene and make Petitioners intervenors and parties of record;
- b. That the Commission allow Petitioners to participate fully in this proceeding and take such positions as they deem advisable; and
- c. That the Commission grant such other and further relief as is just and proper.

Respectfully submitted,

**ADAMS AND REESE, LLP**

BY:

A handwritten signature in black ink, appearing to read "John J. Pringle, Jr.", is written over a horizontal line.

John J. Pringle, Jr.  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, SC 29201  
Telephone: (803) 254-4190  
Facsimile: (803) 799-8479  
[jack.pringle@arlaw.com](mailto:jack.pringle@arlaw.com)

Attorneys for Haig Point Club and  
Community Association, Inc., Melrose  
Property Owner's Association, Inc. and  
Bloody Point Property Owner's Association

July 23, 2015  
Columbia, South Carolina

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2014-346-WS**

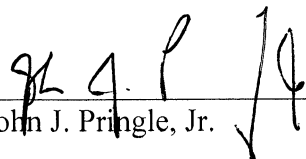
RE:

Application of Daufuskie Island Utility	)	
Company, Inc. for Approval of an	)	<b>CERTIFICATE OF SERVICE</b>
Adjustment for Water and Sewer Rates,	)	
Terms, and Conditions	)	

This is to certify that I have served the **Petition to Intervene** of Haig Point Club and Community Association, Inc. ("HPCCA"), Melrose Property Owner's Association, Inc. ("MPOA"), and Bloody Point Property Owner's Association ("BPPOA") via first-class mail service and electronic mail service as follows:

Shannon Bowyer Hudson, Esquire  
Andrew M. Bateman, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia SC 29201  
[shudson@regstaff.sc.gov](mailto:shudson@regstaff.sc.gov)  
[abateman@regstaff.sc.gov](mailto:abateman@regstaff.sc.gov)

G. Trenholm Walker, Esquire  
Thomas P. Gressette, Esquire  
Pratt-Thomas Walker, PA  
PO Drawer 22247  
Charleston SC 29413  
[gtw@p-tw.com](mailto:gtw@p-tw.com)  
[tpg@p-tw.com](mailto:tpg@p-tw.com)

  
\_\_\_\_\_  
John J. Pringle, Jr.

July 23, 2015  
Columbia, South Carolina